

**IN THE UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: Bradley J. Jacobs, Jr. and
Brittany Dawn Jacobs
Debtors**

**CASE NUMBER 23-10003
Chapter 13**

**LIBERTY FINANCE COMPANY, INC.'S
MOTION TO PAY ADMINISTRATIVE EXPENSES**

COMES NOW, Liberty Finance Company, Inc. ("Liberty"), by and through counsel, and files this its Motion to Pay Administrative Expenses pursuant to 11 U.S.C. §503 and Rule 2016 of the Federal Rules of Bankruptcy Procedure, and would show unto this Honorable Court the following, to wit:

1. Liberty is a secured creditor of the Debtor's primary residence, holding a first lien on certain real property located in Panola County, Mississippi. *See Proof of Claim No. 16 filed in this cause.*

2. After the Debtor's petition was filed, Liberty has been required to pay post-petition administrative expenses for lender-placed insurance on the above-referenced property in the annual amount of \$393.82 since February of 2020. The most recent premium was paid on January 8, 2023. A copy of these expenses is attached hereto as Exhibit "A".

3. Liberty would show that the Debtor should be required to pay these expenses incurred, and that the Debtor should be required to pay any such future expense.

WHEREFORE, PREMISES CONSIDERED, Liberty prays that this Honorable Court will order the Debtor to pay these administrative expenses pursuant to 11 U.S.C. §503 and Rule 2016 of the Federal Rules of Bankruptcy Procedure. Liberty further plays that this Court will grant it all other relief that it is entitled.

Respectfully submitted this the 30th day of May, 2023.

Liberty Finance Company, Inc.

By: 
R. Adam Kirk, MSB# 101240

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CERTIFICATE OF SERVICE

I, R. Adam Kirk, attorney for Liberty Finance Company, Inc., do hereby certify that I have this day, via the CM/ECF system, issued an electronic notification of the above and foregoing document to the following, to wit:

Locke D. Barkley
Chapter 13 Trustee
sbeasley@barkley13.com

United States Trustee
USTPRegion05.AB.ECF@usdoj.gov

Robert Hudson Lomenick, Jr.
Attorney for Debtors
robert@northmsbankruptcy.com

This the 30th day of May, 2023.



R. Adam Kirk, MSB# 101240

EVIDENCE OF LENDER PLACE INSURANCE

MASTER POLICY NO: [REDACTED] 4381
PROPERTY TRACKING ID: 7720288

NAMED INSURED: Liberty Finance Company
ADDRESS: 254 South Main Street
Grenada, MS 38901

LOAN NUMBER: [REDACTED] 8136

LOCATION OF PROPERTY INSURED: JACOBS JR, BRADLEY
29 MILTON TUCKER RD
POPE, MS 38658

INSURED AMOUNT: \$15,000

ORIG. EFFECTIVE DATE: 01/08/2020
COVERAGE PERIOD: 01/08/2022 - 01/08/2023

Insurance

ANNUAL PREMIUM: \$393.82
(This is not an invoice.) (Including applicable taxes and fees)

The insurance coverage procured through the master policy(ies) referenced above has been requested by the Named Insured. The master policy(ies) has been issued by "Certain Underwriters at Lloyd's of London, England" in respect of coverage and limits ordered by the Named Insured. All coverage is subject to the terms, conditions and exclusions expressed in the policy(ies) and is subject to a deductible as defined by the policy(ies).

The Evidence of Insurance is issued as a matter of information only and confers no rights upon the document holder. This document does not amend, extend or alter the coverage, terms, exclusions, conditions or other provisions afforded by the policy(ies) referenced herein.

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